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Staunton, who, by the way, was a clerk in holy orders) said: 'Good people, you cannot agree?' and (to John Allan, his marshal) 'Go and put them in a house until Monday, and not let them eat or drink.' The perils of a professional man were considerable also in those times; for in *Brothe v. Tallard* we find the same judge on a wife's writ of dower against C, who came into Court by attorney, addressing the man of law thus: 'Fair friend, have you sued a writ?' and on the attorney saying that he had but had delivered the bill which witnessed it to his client and praying a postea, Staunton, J., broke out thus: 'You wicked rascal, you shall not have it! But because to delay the woman from her dower, you have vouched and have not sued a writ to summon your warrantor, this Court awards that you go to prison * * * We will have no mainprise, but stay in gaol till you are well chastised.' These are from the records of just six hundred years ago, but they seem to find echoes in our Courts even at the present day."

—London Law Journal.

IN VACATION.

Eviction by Bedbugs.—An action was brought to recover a sum alleged to be due as rent under a lease for an apartment which had been abandoned. Defendant introduced evidence showing that the apartment, including the beds and closets, and all the rooms, was overrun with bedbugs and other vermin of great industry and assiduity. The apartment was not under plaintiff's control, and no covenant against vermin appeared in the lease. The Supreme Court of New York in *Jacobs v. Morand*, 110 New York Supplement 208, held that the presence of vermin in the house does not constitute eviction so as to justify abandonment of the premises by the tenant

BOOK REVIEWS.

Pollard's Code Biennial, 1908, containing all statutes of a general and permanent nature passed by the General Assembly of Virginia at its sessions of 1906 and 1908, also annotations to the Code of Virginia, 1904, and the Constitution and Tax Bill. Edited by John Garland Pollard of the Richmond Bar. For sale exclusively by Everett Waddey & Co. Richmond, Va. 1908. Price \$6.00.

Pollard's Code Biennial is not only now an institution, but a necessity. Its importance to the lawyer who wishes to be "up to date" and to save the time spent in examination necessitated by the vast growth of statute law and decisions in the State of Virginia, is incalculable. The present work—superseding the edition of 1906—gives the amendments or repeal of 377 Sections of the Code of 1904 and one hundred and forty-six independent acts of a general and permanent nature. The annotations cover 102 to 107 Va.—194 to